

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

ROBERT AND HEATHER BLEDSOE
Plaintiffs,

v.

MERIDIAN SECURITY INSURANCE
COMPANY

Defendant.

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CIVIL ACTION NO. 5:20-cv-0004

NOTICE OF REMOVAL

Defendant Meridian Security Insurance Company (“Defendant”), through undersigned counsel and pursuant to 28 U.S.C. §§ 1332, 1441 and 1446, files this Notice of Removal of the lawsuit captioned *Robert and Heather Bledsoe v. Meridian Security Insurance Company, An Entity of State Auto Insurance Companies*; Cause No. 2019CI25066; In the 224th Judicial District of Bexar County, Texas.

**I.
BACKGROUND**

1. Plaintiffs Robert and Heather Bledsoe (hereinafter “Plaintiffs”) initiated the present action by filing his Original Petition in Cause No. 2019CI25066; In the 224th Judicial District of Bexar County, Texas on December 9, 2019 (the “State Court Action”). *See* Plaintiffs’ Original Petition, attached as **Exhibit A**.

2. Defendant appeared and answered on December 3, 2019, asserting a general denial to the claims and allegations made in Plaintiffs’ Original Petition. *See* Defendant’s Original Answer, attached as **Exhibit B**.

3. Pursuant to 28 USC § 1446(a) all a copy of all process, pleadings, and orders served upon Defendant in the State Court Action are incorporated in **Exhibit C**.

4. Pursuant to 28 U.S.C. § 1446(d), promptly after filing this Notice of Removal, Defendant will give written notice of the removal to Plaintiff through his attorney of record, and to the clerk of the 224th Judicial District of Bexar County, Texas.

5. Pursuant to 28 USC §§ 1446(b)(1) and 1446(c)(1) this Notice of Removal has been timely filed within 30 days of service on Defendant of Plaintiffs' Original Petition and less than one year after the commencement of this action.

II. JURISDICTION

6. This Court has original jurisdiction pursuant to 28 U.S.C. § 1332, and the matter is removable to this Court pursuant to 28 U.S.C. § 1441(a) because there is complete diversity of citizenship between the properly joined parties and the amount in controversy exceeds \$75,000 exclusive of interest and costs.

A. Diversity of Parties

7. Plaintiffs are domiciled in Bexar County, Texas. *See Exhibit A*, ¶ 3. Pursuant to 28 U.S.C. § 1332(a), therefore, Plaintiffs are citizens of the State of Texas.

8. Meridian Security Insurance Company is organized under the laws of Indiana and maintains its principal place of business in Indiana. Pursuant to 28 U.S.C. § 1332(c)(1), therefore, Meridian is a citizen of the State of Indiana.

9. Accordingly, there is complete diversity between the parties pursuant to 28 U.S.C. § 1332(a).

B. Amount in Controversy

10. Plaintiffs' Original Petition states that Plaintiffs seeks monetary relief over \$200,000. *See* Plaintiffs' Original Petition, **Exhibit A**, ¶ 2. The threshold for diversity jurisdiction, \$75,000, is therefore met by the allegations of Plaintiffs' Original Petition.

III. CONCLUSION

11. Removal of this action under 28 U.S.C. § 1441(a) is proper as the district courts of the United States have original jurisdiction over the matter pursuant to 28 U.S.C. § 1332, and as all requirements for removal under 28 U.S.C. § 1446 have been met.

12. WHEREFORE, Defendant Meridian Security Insurance Company hereby provides notice that this action is duly removed.

Respectfully submitted,

/s/ Patrick M. Kemp

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**ATTORNEYS FOR DEFENDANT MERIDIAN
SECURITY INSURANCE COMPANY**

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing instrument has been served electronically via CMRRR this the 3rd day of January, 2020 to:

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/s/ Patrick M. Kemp
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